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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ORACLE USA, INC., a Colorado corporation;
 ORACLE AMERICA, INC. a Delaware
 corporation; and ORACLE INTERNATIONAL
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
 SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-00106-LRH-PAL

**PLAINTIFFS ORACLE USA, INC.,
 ORACLE AMERICA, INC., AND
 ORACLE INTERNATIONAL
 CORPORATION'S MOTION TO
 SEAL THEIR OPPOSITION TO
 DEFENDANTS RIMINI STREET
 INC.'S AND SETH RAVIN'S MOTION
 TO PRECLUDE CERTAIN DAMAGES
 EVIDENCE PURSUANT TO
 FEDERAL RULES OF CIVIL
 PROCEDURE 26(E) AND 37(C), OR,
 IN THE ALTERNATIVE, TO
 CONSOLIDATE AND EXHIBIT A TO
 THE DECLARATION OF KIERAN
 RINGGENBERG**

Case No. 2:10-cv-00106-LRH-PAL

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (together “Oracle” or “Plaintiffs”) respectfully request that the Court order the Clerk of the Court to file under seal an unredacted copy of Oracle’s Opposition to Defendants Rimini Street Inc.’s and Seth Ravin’s Motion To Preclude Certain Damages Evidence Pursuant To Federal Rules Of Civil Procedure 26(e) And 37(c), Or, In The Alternative, To Consolidate (“Opposition”) (the “Opposition”) as well as Exhibit A to the Declaration of Kieran P. Ringgenberg in Support of Oracle’s Opposition (the “Ringgenberg Declaration”). Unredacted copies of the Opposition and Exhibit A were individually lodged under seal with the Court on June 16, 2015.

Sealing of the unredacted Opposition is requested because the redacted portions of the motion contain information that Rimini Street, Inc. and Seth Ravin (collectively the “Defendants”), have designated as “Confidential Information” and “Highly Confidential Information – Attorneys’ Eyes Only” under the terms of the Protective Order. Likewise, sealing of the unredacted Exhibit A is requested because it contains information designated as “Confidential Information” and “Highly Confidential Information – Attorneys’ Eyes Only” by the Defendants.

The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ and ‘Highly Confidential Information – Attorneys’ Eyes Only’ under the terms of this Protective Order only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c). The designation by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Dkt. 55 ¶ 2.

Defendants have identified the information redacted in the Opposition as well as Exhibit A as Confidential and Highly Confidential, and therefore Defendants have represented that good

1 cause exists for sealing those portions of the documents. This is a sufficient showing of good
2 cause to permit a sealing order on a nondispositive motion. *See, e.g., Pac. Gas & Elec. Co. v.*
3 *Lynch*, 216 F. Supp. 2d 1016, 1027 (N.D. Cal. 2002).

4 Oracle has submitted all non-redacted portions of the Opposition as well as Exhibit A to
5 the Ringgenberg Declaration for filing in in Court's public files, which allows the public access
6 to all but the redacted portions of the Opposition and Exhibit A. Accordingly, the request to seal
7 is narrowly tailored.

8 For the foregoing reasons, Oracle respectfully requests that the Court find that good cause
9 exists to file under seal the unredacted copies of the Opposition and Exhibit A to the
10 Ringgenberg Declaration.

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12 DATED: June 16, 2015

BOIES SCHILLER & FLEXNER LLP

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14 By: /s/ Kieran P. Ringgenberg
15 Kieran P. Ringgenberg
16 Attorneys for Plaintiffs
17 Oracle USA, Inc., Oracle America, Inc.,
18 and Oracle International Corp.
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June, 2015, I electronically transmitted the foregoing **PLAINTIFFS ORACLE USA, INC., ORACLE AMERICA, INC., AND ORACLE INTERNATIONAL CORPORATION'S MOTION TO SEAL THEIR OPPOSITION TO DEFENDANTS RIMINI STREET INC.'S AND SETH RAVIN'S MOTION TO PRECLUDE CERTAIN DAMAGES EVIDENCE PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 26(E) AND 37(C), OR, IN THE ALTERNATIVE, TO CONSOLIDATE AND EXHIBIT A TO THE DECLARATION OF KIERAN RINGGENBERG** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

/s/ Catherine Duong

An employee of Boies, Schiller & Flexner LLP